

1 GREGORY P. STONE (State Bar No. 78329)
gregory.stone@mto.com
2 BRADLEY S. PHILLIPS (State Bar No. 85263)
brad.phillips@mto.com
3 STEVEN M. PERRY (State Bar No. 106154)
steven.perry@mto.com
4 BETHANY W. KRISTOVICH (State Bar No. 241891)
bethany.kristovich@mto.com
5 MUNGER, TOLLES & OLSON LLP
6 355 South Grand Avenue, 35th Floor
Los Angeles, California 90071-1560
7 Telephone: (213) 683-9100
Facsimile: (213) 687-3702

8 Attorneys for Defendant Intel Corporation
9

10
11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN JOSE DIVISION**
14

15 IN RE: HIGH-TECH EMPLOYEE
16 ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

17 THIS DOCUMENT RELATES TO:

**DECLARATION OF KASIA HANSON
IN SUPPORT OF DEFENDANTS'
JOINT ADMINISTRATIVE MOTION
TO FILE UNDER SEAL**

18 ALL ACTIONS
19
20
21
22
23
24
25
26
27
28

1 I, Kasia Hanson, hereby declare and say:

2 1. I am a Global Account Sales Manager at Intel Corporation. I have personal
3 knowledge of the matters stated in this declaration, except those matters identified below
4 as being based on information and belief. I make this declaration in support of
5 Defendants' Joint Administrative Motion to File Under Seal that is being filed
6 concurrently with this declaration. If called and sworn as a witness, I could and would
7 competently testify to the matters stated below.

8 **The Intel Confidential Information that Should Be Sealed**

9 2. I have reviewed portions of Exhibit 2356 to the Declaration of Lisa Cisneros
10 in Support of Plaintiffs' Opposition Brief Re Dkts 554, 556, 557, 559, 560, 561, 564, and
11 570 (Dkt. No. 605-1). I am informed and believe that Cisneros Declaration Exhibit 2356 is
12 a compilation of a letter and supporting documents provided by Pixar Animation Studios
13 to the United States Department of Justice on January 13, 2010. Exhibit 2356 includes two
14 exhibits, marked as Tab A and Tab D, that contain confidential and commercially sensitive
15 information regarding Intel's collaborations with Pixar (the "Confidential Pixar
16 Documents"). I am informed and believe that Exhibit 2356, including the Confidential
17 Pixar Documents, was produced by Pixar and designated "CONFIDENTIAL –
18 ATTORNEY'S EYES ONLY" pursuant to the protective order in this Action (Dkt. 107).

19 3. Through my experience working at Intel, I am familiar with the type of
20 information reflected in the Confidential Pixar Documents.

21 **The Reasons for Sealing the Redacted Information**

22 4. The Confidential Pixar Documents described below contain information
23 reflecting confidential business practices and other confidential information regarding
24 Intel's collaborations with Pixar. This information gives Intel a competitive advantage in
25 the marketplace and would cause competitive harm to Intel if the documents were
26 disclosed.

27 5. Intel derives independent economic value from the strategic and/or
28 confidential information contained in the Confidential Pixar Documents not being known

1 to the public or to the persons who can obtain economic value from that information's
 2 disclosure or use. Specifically, the Confidential Pixar Documents contain the following
 3 Intel confidential, commercially sensitive information:

- 4 • **Tab A to the Pixar white paper** (PIX00002100-2129) is an email and related
 5 attachment that I sent to Pixar on August 23, 2006 regarding Intel's collaboration
 6 with Pixar to design a graphics processor, code named "Larrabee." I have
 7 reviewed this document, and my attachment to my email should be redacted to
 8 preserve Intel's confidential and competitively sensitive information. As stated in
 9 my email, Intel considers this information secret. In particular, this document
 10 contains extensive information regarding the preliminary design goals and
 11 technical specifications of the collaboration, including detailed technical
 12 discussions, strategic business analysis, and objectives related to the collaboration.
- 13 • **Tab D to the Pixar white paper** (PIX00002182-PIX0002188) contains a Proposed
 14 Term Sheet agreement between Intel and Pixar associated with its collaborations. I
 15 have reviewed this document and identified limited redactions that preserve Intel's
 16 confidential and competitively sensitive information. In particular, the redacted
 17 information includes details on Intel's and Pixar's design and development of
 18 collaborative products, including Larabee, their contemplated goals and business
 19 objectives, and specific proposed terms and conditions that would govern that
 20 collaboration.

21 6. Intel's practice is to treat the Confidential Pixar Documents as confidential
 22 and not to disclose them outside of the company. I am informed and believe that Intel has
 23 taken reasonable steps to ensure that these documents remain confidential, including
 24 designating them "ATTORNEY'S EYES ONLY" pursuant to the protective order filed in
 25 this Action.

26 **The Particularized Harm Disclosure Would Cause**

27 7. Intel would suffer particularized harm if the Confidential Pixar Documents
 28 described above were disclosed to the public. Disclosure of this information would reveal

1 Intel's confidential business practices related to its collaborations, including detailed
2 descriptions of technical aspects of those collaborations and the related products, as well as
3 Intel's competitively sensitive strategic planning associated with those efforts.

4 Collaborations are a critical component of Intel's business, and public disclosure of the
5 preliminary, technical specifications and design of Intel's collaborative ventures with Pixar
6 would give other companies with which Intel competes an unearned advantage by
7 providing them with access to Intel's product development and marketing strategies.
8 Disclosure of this technical information would also deprive Intel of its investment in
9 developing those products and related business strategies, which Intel uses to compete in
10 the marketplace.

11 8. Because the information redacted in the above-referenced documents cannot
12 be disclosed without causing particularized harm to Intel, it should be protected from
13 public disclosure.

14
15 I declare under penalty of perjury under the laws of the United States that the
16 foregoing is true and correct.

17
18 Executed this 20th day of February, 2014 at Santa Clara, California.

19 DATED: February 20, 2014

20
21
22 
23 Kasia Hanson